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**Attorneys for Defendant**  
*Cook County Health*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

KEVIN K SHANAHAN, MICHAEL  
NEWTON, JAMES SHOFROTH, and  
ROSEMARY KERRANE, as agent in fact and  
durable power of attorney for ROBERT H.  
SPINNEY, individually and on behalf of all  
others similarly situated,

Plaintiff,

vs.

PERRY JOHNSON & ASSOCIATES, INC.,  
NORTHWELL HEALTH, INC., SALEM  
REGIONAL MEDICAL CENTER, and COOK  
COUNTY HEALTH,

Defendants.

CASE NO. 2:23-cv-01947

**AMENDED STIPULATION TO EXTEND  
DEFENDANT COOK COUNTY  
HEALTH'S DEADLINE TO RESPOND  
TO COMPLAINT**

TO THIS HONORABLE COURT, TO THE CLERK OF THE UNITED STATES  
DISTRICT COURT FOR THE DISTRICT OF NEVADA, AND TO ALL PARTIES  
THROUGH THEIR COUNSEL OF RECORD HEREIN:

Pursuant to Federal Rule of Civil Procedure, Rule 6(b) and Local Rule 6-1, Plaintiffs  
Kevin K Shanahan, Michael Newton, James Shofroth, and Rosemary Kerrane, as agent in fact  
and durable power of attorney for Robert H. Spinney ("Plaintiffs") on the one hand, and  
Defendant Cook County Health ("CCH") on the other hand, stipulate to an extension of time for  
CCH to respond to Plaintiffs' complaint in this matter.

Plaintiffs filed their complaint on November 22, 2023, and served CCH on November 30, 2023. CCH's responsive pleading is due December 21, 2023.

On or about November 30, 2023, CCH retained Gordon & Rees LLP as counsel in this matter. CCH has requested an extension of time to respond to the Complaint, up to and including January 29, 2024. CCH requires additional time to investigate factual and legal issues and respond to the Motion for Transfer and Centralization filed by certain plaintiffs before the Judicial Panel on Multidistrict Litigation. Counsel for Plaintiffs have agreed to the extension.

There does not appear to have been entered a scheduling order in this case; thus, there are no dates set for trial, motions, or discovery.

**IT IS HEREBY STIPULATED** that CCH shall have up to and including January 29, 2024, to respond to Plaintiffs' complaint.

**IT IS SO STIPULATED.**

Respectfully submitted,

Dated:

**GORDON REES SCULLY MANSUKHANI**

By: /s/ Sean Flynn  
Sean Flynn  
Attorneys for Defendant  
Cook County Health

Dated:

KEMP JONES, LLP

By: /s/ Don Springmeyer  
Don Springmeyer  
Attorneys for Plaintiffs  
Kevin K. Shanahan, Michael Newton,  
and Rosemary Kerrane

**IT IS SO ORDERED:**

DATED: December 27, 2023

  
DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE